

DR. LEROY A. GARRETT

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October 29, 2025

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE
CRYSTALLEX INTERNATIONAL CORP.,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA, et al.,
Defendants.

Case No. 1:17-mc-00151-LPS

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
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LETTER CLARIFYING PETROAMIGOS IRRELEVANCE, CONFIRMING SOLO STANDING, AND REITERATING PINCUS QSF AGREEMENT FOR 23,000 VICTIMS

Dear Judge Stark:

I, Leroy A. Garrett, pro se, notify the Court that Petroamigos (Venezuelan NGO, unregistered in U.S.) is irrelevant to my associational standing for 23,000 PDVSA workers (2002-2003 Petroleum Holocaust victims). It ceased support due to Venezuela's crisis (OAS/IACHR Report, Jan. 7, 2025). I stand alone, authorized by sworn affidavits, law degrees (USM Venezuela 1992; Purdue 2014), and precedents (*Vaca v. Sipes*, 386 U.S. 171 (1967); *Hunt v. Wash. State Apple*, 432 U.S. 333 (1977)).

My Crystallex participation centered on agreeing to the Pincus-headed QSF commission (my proposal, D.I. 1963 et al.)—**more relevant than standing**—securing 5% reservation (~\$150M Citgo proceeds) for victims. Unapetrol/Medina's breach (*Vaca*) left this gap; affidavits fill it (*Haines v. Kerner*, 404 U.S. 519 (1972)).

Request: Reconsider intervention; reserve QSF share pending Hall ruling (1:24-cv-00380-JLH, D.I. 46-49).

Thank you.



Dr. Leroy A. Garrett

Pro Se Representative for ~23,000 Petroleum Holocaust Victims